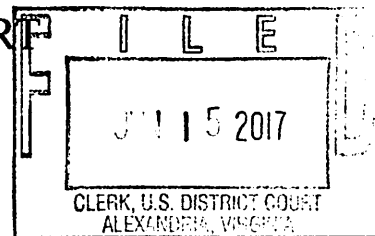


UNITED STATES DISTRICT COURT

for the
Eastern District of Virginia

In the Matter of the Seizure of)
 (Briefly describe the property to be seized))
 All Funds in Bank of America Account Nos.)
 4350-3829-1171 and 4350-3829-1184, held in the names of)
 Allen Arojurae and Thompson Arojurae)

Case No. 1:17sw321

APPLICATION FOR A WARRANT
TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, a federal law enforcement officer or attorney for the government, request a seizure warrant and state under penalty of perjury that I have reason to believe that the following property in the Eastern District of Virginia is subject to forfeiture to the United States of America under 18 U.S.C. § 981 (describe the property):

All Funds in Bank of America Account Nos. 4350-3829-1171 and 4350-3829-1184, held in the names of Allen Arojurae and Thompson Arojurae

The application is based on these facts:

SEE ATTACHED AFFIDAVIT

☐ Continued on the attached sheet.

Reviewed by AUSA/SAUSA:

AUSA Karen L. Taylor

Michelle J. Fedyszen
 Applicant's signature

Michelle J. Fedyszen, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/15/17 3:45pm

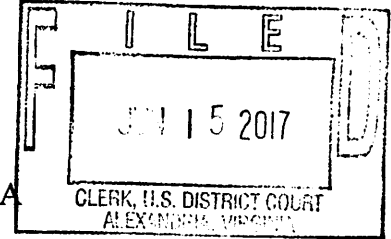
City and state: Alexandria, Virginia

/s/ Michael S. Nachmanoff
 United States Magistrate Judge
 Judge's signature

Michael S. Nachmanoff, United States Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



IN THE MATTER OF THE SEIZURE OF)
ALL FUNDS IN THE BELOW ACCOUNTS:) CASE NO. 1:17-SW-321
)
BANK OF AMERICA ACCOUNT NOS.)
4350-3829-1171 AND 4350-3829-1184,)
HELD IN THE NAMES OF ALLEN)
AROJURAYE AND THOMPSON AROJURAYE)

AFFIDAVIT IN SUPPORT OF SEIZURE WARRANT

I, Michelle L. Fedyszen, being duly sworn, hereby depose and state as follows:

1. I am a Special Agent employed by the Federal Bureau of Investigation (FBI). I have been so employed since 2001. Currently I am assigned to the Asset Forfeiture Squad in the FBI's Washington Field Division. My assignments include investigating the asset forfeiture aspects of suspected violations that include, but are not limited to, mail fraud (Title 18, United States Code, Section 1341), wire fraud (Title 18, United States Code, Section 1343), and money laundering (Title 18, United States Code, Sections 1956 and 1957). In addition to the law enforcement training I have received in these matters and general criminal investigations, I have also attended the Money Laundering conference.

2. I have been assigned to assist in the asset forfeiture investigation involving the defendant, Adelaja Allen Arojuraye (Arojuraye), and thus, am familiar with efforts to locate the proceeds of the defendant's criminal conduct. The information contained in this affidavit is based on information provided to me by other law enforcement agents, and is based on a review of various documents and records.

3. On April 21, 2017, Arojuraye, pled guilty to a three-count criminal information charging the defendant with wire fraud, in violation of Title 18, United States Code, Section 1343; theft of government money, in violation of Title 18, United States Code, Section 641; and passport fraud, in violation of Title 18, United States Code, Section 1542. The defendant agreed to the entry of a forfeiture money judgment in the amount of \$502,716.00, and the forfeiture of all interests in any fraud or government theft related asset that is traceable to, derived from, fungible with, or a substitute for property that constitutes the proceeds of the offenses. On June 7, 2017, that money judgment was entered by United States District Judge Claude M. Hilton (Dkt. #10; 1:17cr87 (EDVA)).

4. In searching for criminal proceeds from the wire fraud and theft of government money, agents of the U.S. Department of Education, Office of Inspector General (OIG), Social Security Administration OIG, U.S. Department of State OIG, and National Science Foundation OIG conducted an investigation into Arojuraye's assets, including assets directly traceable to the wire fraud, theft of government money and possible substitute assets.

5. Pursuant to paragraph 11(g) of the plea agreement, on April 26, 2017, Arojuraye provided a list of all financial and investment accounts and account balances in which he exercised any control. See the table for a summary of the accounts:

FINANCIAL INSTITUTION	ACCOUNT HOLDER(S)	ACCOUNT NUMBER	BALANCE
AMERICAN EXPRESS	ADELAJA AROJURAYE	151-463-1389	\$11,034.15
BANK OF AMERICA	ADELAJA AROJURAYE	4350-2993-0030	\$2,232.49
BANK OF AMERICA	ADELAJA AROJURAYE	4350-3876-0398	\$2,348.50
BANK OF AMERICA	ADELAJA AROJURAYE	0094-6674-2568	\$3,010.47
BANK OF AMERICA	ALLEN AROJURAYE & THOMPSON AROJURAYE	4350-3829-1171	\$2,347.43
BANK OF AMERICA	ALLEN AROJURAYE & JULIANAH AROJURAYE	4350-2991-5770	\$2,864.90

BANK OF AMERICA	ADELAJA AROJURAYE	4350-2993-0043	\$500.24
BANK OF AMERICA	ADELAJA AROJURAYE	4350-3876-0408	\$555.56
BANK OF AMERICA	ALLEN AROJURAYE & THOMPSON AROJURAYE	4350-3829-1184	\$500.00
BANK OF AMERICA	ALLEN AROJURAYE & JULIANAH AROJURAYE	4350-2991-5796	\$500.00
BANK OF AMERICA/ MERRILL EDGE	ADELAJA AROJURAYE	29Z-43A28	\$49,577.82
CAPTIAL ONE BANK	ADELAJA AROJURAYE	000018-4326-8043	\$70.63
CAPITAL ONE BANK	ADELAJA AROJURAYE	000083-1650-3048	\$399.60
DISCOVER BANK	ALLEN AROJURAYE & THOMPSON AROJURAYE	590-192282-8	\$155.79
DISCOVER BANK	ALLEN AROJURAYE & JULIANAH AROJURAYE	700-284915-6	\$102.96
JP MORGAN CHASE	ADELAJA AROJURAYE	000-0007-0825-6185	\$2,489.19
JP MORGAN CHASE	ADELAJA AROJURAYE	000-0023-3073-0256	\$300.00
TOTAL:			\$78,989.73

6. The total balance of funds identified by Arojuraye is subject to forfeiture in partial satisfaction of the money judgement.

7. In attempting to trace the criminal proceeds, it appears that the defendant has spent many of those proceeds during the years of the scheme and has conducted various financial transactions that have complicated the effort to trace the funds.

8. Therefore, based upon my experience and training, and given that the case agents have not been able to locate any current assets traceable to the criminal activity, I believe that as a result of the acts or omissions of Arojuraye the criminal proceeds have been transferred or deposited with an unidentified third party, have been placed beyond the jurisdiction of this court, and have been substantially diminished in value, or commingled with other property which cannot be divided without difficulty.

9. Your affiant requests that the Court issue a seizure warrant allowing law enforcement agents with the FBI to seize the aforementioned accounts.

Michelle L. Fedyszen
Michelle L. Fedyszen, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on the 15th day of June, 2017, at Alexandria, Virginia.

Michael S. Nachmanoff
United States Magistrate Judge